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U.S. BANKRUPTCY COURT
ST. PAUL, MN

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Case No. 17-41184

Ruby Red Dentata, LLC,

Chapter 7

Debtor.

RESPONSE OF LIEN CREDITOR A.D. WALSH TO MOTION OF
TRUSTEE FOR AUTHORIZATION TO SELL PROPERTY FREE AND CLEAR

By Motion dated 9/10/2019, the Chapter 7 Trustee seeks authority to sell the two commercial buildings and other property of the estate formerly owned by the Debtor.

The undersigned Arthur D. Walsh holds a secured claim against the real property, allowed earlier herein and treated in the Chapter 11 Amended Plan of Reorganization dated 2/23/18 as a "Class 4 - Secured Claim." Amended Plan, Art. IV at 4.

The undersigned is not opposed to the Trustee's motion. I write merely to allay any confusion as to the amount due me, there being two differing references to it in the Trustee's motion papers.

At paragraph 12 on page 4 of his motion, the Trustee provides a chart identifying eight (8) liens and encumbrances said to be of record. Two of them, items (e) and (g), each in a different amount, are said to be in my name.

In fact, they relate to the same matter, item (e) being the amount of my attorney's lien when originally recorded on 9/10/2012, and item (g) being the amount of judgment entered as to it in my favor with interest, costs, etc., on 6/30/17, almost four years later.

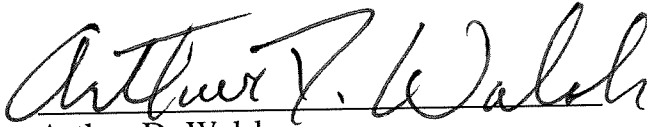
Interest runs on the judgment at 1.5 percent per month as agreed with Debtor's chief manager long before suit and later stipulated to in court at a first call for trial.

A proof of claim was refiled in this Chapter 7 case on 11/15/2018 in an updated amount agreed to with Debtor's counsel at a hearing on 8/20/2018 and approved by this court for payment in its Order of 8/31/2018.

That amount was \$13,500. With simple interest continuing to run at \$202.50, the present value of the judgment at this writing is just over \$16,000.

This is an amalgam of both items (e) and (g) and represents the true amount due. The proof of claim herein, referenced above, has attachments providing further detail on the lien and the award of summary judgment respecting it.

DATED: September 26, 2019.


Arthur D. Walsh
Secured Claim Holder
329 Geneva Ave. N. #117
Saint Paul, Minnesota 55128
Phone: (612) 414-4114

DECLARATION OF SERVICE BY MAIL

STATE OF MINNESOTA))
) SS.
COUNTY OF RAMSEY)

Arthur D. Walsh states and affirms that on this 26th day of September 2019, he served the attached Response of Lien Creditor A.D. Walsh to Motion of Trustee for Authorization to Sell in the Chapter 7 bankruptcy of Ruby Red Dentata, Case File No. 17-41184, upon the person named below by placing a true and correct copy thereof in an envelope and depositing the same in the U.S. mail at Metropolitan Twin Cities, Minnesota, proper postage affixed, addressed as follows:

Matthew D. Swanson
Attorney for Randall L. Seaver
Trustee in Bankruptcy
12400 Portland Ave. So. #132
Burnsville, MN 55337

I declare under penalty of perjury that everything I have stated in this document is true and correct.

Arthur B. Walsh